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7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 \* \* \*

11 NILE LEATHAM, and THE ESTATE OF  
12 MARIE LEATHAM-DAVIS

13 Plaintiffs,

14 vs.

15 SAFECO INSURANCE COMPANY OF  
16 AMERICA, a foreign entity; SAFECO  
17 INSURANCE COMPANY OF ILLINOIS, a  
18 foreign entity; DOES I through X, inclusive;  
and ROE CORPORATIONS I through V,  
19 inclusive,

20 Defendants,

Case No. 2:23-cv-01432-JCM-DJA

21 **JOINT STIPULATION AND ORDER TO**  
22 **EXTEND DISPOSITIVE MOTION**  
23 **DEADLINE**

24 **(First Request)**

25 IT IS HEREBY STIPULATED AND AGREED by Plaintiffs, NILE LEATHAM, and THE  
26 ESTATE OF MARIE LEATHAM-DAVIS (“Plaintiffs”) and Defendants SAFECO INSURANCE  
27 COMPANY OF AMERICA and SAFECO INSURANCE COMPANY OF ILLINOIS (“Safeco”)  
(collectively, the “Parties”), by and through their undersigned counsel, that current deadline to file  
the dispositive motions be extended 21 days, from August 21, 2024 to September 11, 2024. This is  
the Parties’ first request to extend deadlines in this matter.

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Pursuant to Local Rules LR IA 6-1 and LR 26-3, the Parties state as follows:

**I. DISCOVERY COMPLETED TO DATE**

- The Parties conducted the Fed. R. Civ. P. 26(f) conference.
- The Parties have exchanged initial and supplemental disclosures of documents and lists of witnesses.
- The Parties have served written discovery, and responses have been served.
- The Parties participated in mediation.
- Plaintiffs have deposed Safeco employees/FRCP 30(b)(6) witnesses.
- Safeco has served its expert witness disclosure statement and its experts' reports.

**II. DISCOVERY TO BE COMPLETED & STATUS OF DISPOSITIVE MOTIONS**

Discovery has been completed. The deadline to file dispositive motions is currently August 21, 2024.

**III. REASONS WHY THE DEADLINES CANNOT BE COMPLETED WITHIN THE CURRENT SCHEDULE**

This Stipulation and Order is requesting the Court extend the current August 21, 2024 deadline twenty (21) days to September 11, 2024 for the filing of dispositive motions. Good cause exists to extend the deadline in that counsel for the Plaintiffs recently completed the out-of-state depositions for Safeco employee and FRCP 30(b)(6) witnesses in Spokane, WA on August 7 -8, 2024. The Parties have not yet received the transcripts from these depositions and will requires said transcripts in order to prepare and file dispostive motions. Counsel for Defendants have graciously agreed to the requested extension so that the parties' may receive the transcripts, prepare and file dispositive motions.

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**PROPOSED SCHEDULE**

Accordingly, the Parties hereby stipulate to the following extended discovery schedule:

<b>EVENT</b>	<b>CURRENT DATE</b>	<b>PROPOSED DATE</b>
Dispositive Motions	August 21, 2024	<b>September 11, 2024</b>
Pre-Trial Order	<p>The Joint Pre-Trial Order shall be filed no later than 30 days after the date set for filing dispositive motions if none are timely filed.</p> <p>If dispositive motions are timely filed, the date for filing the Pre-Trial Order shall be suspended until 30 days after said motions are decided.</p>	<p><b>October 11, 2024</b></p> <p>If dispositive motions are timely filed, the date for filing the Pre-Trial Order shall be suspended until 30 days after said motions are decided.</p>

It is so stipulated this 21<sup>st</sup> day of August, 2024.

**BOWEN LAW OFFICES****CLYDE & CO US LLP**

By: /s/ Jerome R. Bowen, Esq.

By: /s/ Lee H. Gorlin, Esq.

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*Attorneys for Defendants*

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT COURT JUDGE

**DATED:** August 21, 2024

**CERTIFICATE OF SERVICE**

Pursuant to NEFCR 9, F.R.C.P. 5, NRCP 5 and/or EDCR 7.26, I hereby certify that I am an employee of BOWEN LAW OFFICES, and that on the 21<sup>ST</sup> day of August, 2024, I served a true and correct copy of the forgoing **JOINT STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE - (First Request)**. by:

XX **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case

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